

ARMSTRONG TEASDALE LLP
By: Michael J. Engle, Esquire
Attorney ID: 85576
2005 Market Street
One Commerce Square, 29th Floor
Philadelphia, PA 19103

ATTORNEY FOR DEFENDANT

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

vs.

JOSEPH LAFORTE

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Criminal No.: 20-CR-00231

DEFENDANT'S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

The Defendant, **JOSEPH LAFORTE**, by and through his attorney, Michael J. Engle, Esquire, hereby moves that this Honorable Court permit him to travel outside the Eastern District of Pennsylvania in order to attend his civil SEC trial in Fort Lauderdale, Florida, and in support of this Motion it is averred that:

1. On August 5, 2020, the Defendant was indicted on one count of violating 18 U.S.C. § 922(g)(1).
2. On October 8, 2020, the Court granted Defendant's Motion for Pretrial Release. The Defendant was permitted to be released from custody on bond secured by property to home detention with electronic location monitoring at his residence in Haverford, Pennsylvania. DE #29.
3. On October 22, 2020, the surety bond was entered, and the Defendant was released from custody. DE #34.
4. For the past year, the Defendant has been fully compliant with all aspects of his pre-trial release conditions.

5. The Defendant is a party to a civil litigation matter in Federal District Court in the Southern District of Florida, *Securities and Exchange Commission v. Complete Business Solutions Group, Inc. d/b/a Par Funding, et. al.*, Docket Number 20-CIV-81205. The District Court in Florida has ordered this case to be set for trial during the Court's two-week calendar period beginning on December 6, 2021. See "Exhibit A" which is attached to this motion.

6. According to the Defendant's civil defense counsel, jury selection in the aforementioned trial will commence on December 3, 2021.

7. As part of his pre-trial release conditions, the Defendant's travel is restricted to the Eastern District of Pennsylvania, unless he obtains prior approval for travel outside the district from this Honorable Court.

8. The Defendant therefore respectfully seeks permission of this Honorable Court to travel outside the Eastern District of Pennsylvania to Ft. Lauderdale, Florida on December 2, 2021, and to return directly to this district as soon as the aforementioned civil trial is completed.

9. During the trial the Defendant would be able to stay at the Dalmar Hotel located at 299 North Federal Highway, Fort Lauderdale, Florida 33301.

10. Defendant would be able to travel to Fort Lauderdale, Florida via a direct flight from Philadelphia on American Airlines Flight # 1392 on December 2, 2021, departing at 10:45 a.m.

11. Counsel for the government has no objection or opposition to the relief requested herein.

WHEREFORE, JOSEPH LAFORTE, respectfully requests that this Honorable Court permit him to travel as set-forth in this motion.

RESPECTFULLY SUBMITTED:

SIGNATURE CODE: MJE5849
MICHAEL J. ENGLE, ESQUIRE
ATTORNEY FOR DEFENDANT